

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Civil Action No.: 1:21-mc-00006-UA-LPA

In re Application of KARAM SALAH
AL DIN AWNI AL SADEQ and
STOKOE PARTNERSHIP
SOLICITORS for an Order under 28
U.S.C. § 1782 to Conduct Discovery
for Use in Foreign Proceedings

**JOINT MOTION FOR
PROTECTIVE ORDER**

Pursuant to Federal Rules of Civil Procedure 26(c) and 29, the Parties jointly request that the Court enter the proposed Consent Protective Order attached hereto as Exhibit A. The Parties believe that the entry of the proposed Consent Protective Order is necessary to ensure that confidential and proprietary information produced in discovery is not publicly disclosed. The proposed Consent Protective Order balances the public's right to access court records with the Parties' need to protect against the public disclosure of confidential information, which, if released, could cause them harm.

Accordingly, the Parties hereby move the Court to enter the attached Consent Protective Order, which will govern the production, exchange, and use of discovery materials and other information in this case.

Respectfully submitted this 8th day of February, 2024.

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CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of February, 2024, the foregoing was electronically filed using the Court's CM/ECF system, which will electronically notify the following counsel of record:

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